

The Honorable Judge John H. Chun

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

R.S., on behalf of himself and all others similarly  
situated,

Plaintiff,

v.

COSTCO WHOLESALE CORPORATION,

Defendant.

Case No. 2:23-cv-01628-JHC

**STIPULATED MOTION AND ORDER  
FOR EXTENSION OF DEFENDANT’S  
TIME TO ANSWER**

**STIPULATION**

Pursuant to Local Rule 7(j), Plaintiff R.S. (“Plaintiff”) and Defendant Costco Wholesale Corporation (“Defendant”) hereby respectfully submit this stipulated motion for an extension of time for Defendant to answer, move or otherwise respond to Plaintiff’s Complaint – Class Action (“Complaint”) and, in support thereof, state as follows:

1. Plaintiff filed his Complaint on October 25, 2023;
2. Pursuant to Fed. R. Civ. P. 12 (a)(1)(A)(i), Defendant’s current deadline for responding to Plaintiff’s Complaint is November 20, 2023;
3. Good cause exists to grant the extension because counsel for Defendant was recently retained and needs additional time to review the allegations, investigate the underlying

facts, and analyze issues regarding coordination and consolidation of multiple additional, similar, matters pending against Defendant, before preparing Defendant's response;

4. This motion is not filed for the purpose of delay, and no party will be prejudiced by the granting of this motion; and

5. Subject to Court approval, the Parties stipulate and agree that Defendant shall have an extension of time up to and including December 20, 2023 to answer, move or otherwise respond to Plaintiff's Complaint.

WHEREFORE, the Parties respectfully request that this stipulated motion be granted and that Defendant be granted an extension of time up to and including December 20, 2023 to answer, move or otherwise respond to Plaintiff's Complaint.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD on this 20th day of November 2023.

s/ Kristin M. Asai

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*Attorneys for Plaintiff*

**ORDER**

It is so ORDERED:

Defendant shall have an extension of time up to and including December 20, 2023 to answer, move or otherwise respond to Plaintiff's Complaint.

Dated this 21st day of November, 2023.

By:   
Hon. Judge John H. Chun